

FILED

NOV 14 2019

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MALIK ROSS and
SHAMEKIA JACKSON,

Defendants.

No. S1- 4:19CR0740 (RWS)

SUPERSEDING INDICTMENT

COUNT ONE

The Grand Jury charges that:

On or about August 13, 2019, in the City of St. Louis, within the Eastern District of
Missouri,

MALIK ROSS,

the defendant herein, being an agent of and connected in any capacity with Midwest Regional
Bank, whose deposits are federally insured, with intent to injure and defraud Midwest Regional
Bank, did willfully misapply, embezzle and purloin more than \$1,000.00 of the moneys and
funds of Midwest Bank entrusted to the custody and care of the defendant.

In violation of Title 18, United States Code, Section 656.

COUNT TWO

The Grand Jury further charges that:

From on or about August 12, 2019, and continuing thereafter until on or about August 13, 2019, in the City of St. Louis, within the Eastern District of Missouri, and elsewhere,

**MALIK ROSS and
SHAMEKIA JACKSON,**

the defendants herein, did knowingly and willfully combine, conspire and agree with each other to commit an offense against the United States, or any agency thereof, in any manner or for any purpose; that is, with the intent to injure and defraud Midwest Regional Bank, whose deposits are federally insured, an agent and a person connected in any capacity with Midwest Regional Bank did willfully misapply, embezzle and purloin more than \$1,000.00 of the moneys and funds of Midwest Bank, which were entrusted to the custody and care of that agent and person.

OVERT ACTS

In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the Eastern District of Missouri and elsewhere:

1. On or about August 13, 2019, while employed with Garda World Logistics, Inc., MALIK ROSS drove an armored vehicle on South Broadway in the City of St. Louis, Missouri, where he stopped the armored vehicle in the street, opened the vehicle door and placed a black bag containing \$50,000 in the street.

2, SHAMEKIA JACKSON, driving another vehicle on South Broadway, stopped her vehicle at the black bag, opened her vehicle door and retrieved the black bag containing \$50,000.

3. MALIK ROSS and SHAMEKIA JACKSON thereafter distributed between them the \$50,000 contained within the black bag.

In violation of Title 18, United States Code, Section 371.

A TRUE BILL

FOREPERSON

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